

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

Eliseo Rivera Cortés, Gloria Pillot, et al,

Plaintiffs

v.

Airport Catering Services, Corp.,
Union Independiente de Trabajadores
de Aeropuertos

Defendants

Civil No. 98-2092(GG)

CIVIL ACTION

**MOTION SUBMITTING FIRST SET OF TRANSLATED RELEASE
AGREEMENTS**

TO THE HONORABLE COURT:

Comes now Co-Defendant, Airport Catering Services Corp., hereinafter referred to as ACS, represented by its undersigned attorneys and very respectfully states and prays as follows:

1. As ordered by this Honorable Court on its November 8, 2004, Order, the appearing party hereby encloses the following first set of translated release agreements:

1. Release signed by Mr. Ismael Rivera (plaintiff)..... 8-12
2. Release signed by Ms. Gloria M. Pillot (plaintiff)..... 13-19
3. Release signed by Mr. Manuel Morales (plaintiff) and related documents 20-28
4. Release signed by Mr. Edgardo A. Delgado (plaintiff) 29-35
5. Release signed by Ms. Carmen Mercado (plaintiff) and related documents 36-43
6. Release signed by Ms. Sara Morales (plaintiff) and related documents 44-53
7. Release signed by Ms. Francia Santamaría (plaintiff) and related documents..... 54-62
8. Release signed by Ms. Loyda López (plaintiff) and related documents..... 63-71
9. Release signed by Ms. Carmen García Díaz (plaintiff) 72-78

10.	Release signed by Mr. Luis a. Paz (plaintiff) and related documents	79-87
11.	Release signed by Mr. Noel Nieves Rodríguez (plaintiff) and related documents	88-96
12.	Release signed by Mr. José N. Fuentes (plaintiff)	97-103
13.	Release signed by Ms. Ana Meléndez (plaintiff) and related documents.....	104-112
14.	Release signed by Ms. Beatriz Laboy (plaintiff)	113-119
15.	Release signed by Mr. Rafael Villafañe (plaintiff)	120-126
16.	Release signed by Ms. Marisol De Jesús (plaintiff) and related documents.....	127-135
17.	Release signed by Mr. Salvador Reyes (plaintiff) and related documents	136-145
18.	Release signed by Mr. Fernando Santos (plaintiff) and related documents	146-155

2. The rest of the translated release agreements will be submitted as they become available.

WHEREFORE, we respectfully request from this Honorable Court to accept the herewith enclosed documents with their corresponding certified translation in English.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of January, 2005.

I HEREBY CERTIFY that on January, 12, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Luis R. Mellado-González, Esq.; José Carreras, Esq.; and Nereida Feliciano Ramos, Esq.

s/ Alberto R. Estrella Arteaga
Alberto R. Estrella Arteaga
USDC PR No. 217606
Curbelo, Baerga & Quintana Law Office
Union Plaza Bldg. Suite 810
Ponce de León Avenue 416
San Juan, PR 00918-3426
Tel. (787) 753-7455
Fax. (787) 756-5796
curbelobaerga@microjuris.com